

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA

IN RE:

GREEN COPPER HOLDINGS, LLC)
EIN # XX-XXX9708)

CASE NO. 25-10088-T
Chapter 7

COPPER TREE, INC.)
EIN # XX-XXX6608)

Substantively Consolidated

THE INN AT PRICE TOWER INC.)
Debtors.)
/

**CLAIMANT PICTORIA STUDIOS USA, INC., (Claim No. 14), AND CLAIMANT
TAKTIK ENTERPRISES, INC. (Claim No. 4) OBJECTION TO CLAIM NO. 16, et.al,
CLAIMANT THE FRANK LLOYD WRITE BUILDING CONSERANCY, AND NOTICE
OF OPPORTUNITY TO BE HEARD**

COMES NOW PICTORIA STUDIOS USA, INC., (CLAIM NO. 14), and, Claimant
TAKTIK ENTERPRISES, INC. (Claim No. 4) by and through their undersigned counsel and
**hereby files this Objection to Claim No. 16, filed on June 6, 2025, and Notice of Opportunity
to be Heard**, and as grounds thereof states as follows:

1. Takio and Pictoria shall be referred to from time to time collectively as “Movants”.
2. On June 6, 2025, Claimant Frank Lloyd Write Building Conservancy (“FLWC”) filed Claim No. 16 in the amount of \$170,000. (See, [Case 25-10088-T Claim 16-1 Filed 06/06/25 Main Document Pg 1 of 6](#)).
3. Movants contend that the Claimant FLWC has no legal claim to attorney fees from where they base their claim of \$170,000; at least not against the Debtors.
4. Movants would also contend that if it is found that they were entitled to a claim for legal fees the amount of \$170,000 is hereby disputed.

5. Should Claimant contend that their claim for \$170,000 is not based upon an award of attorney fees as set forth within the Trustee's Motion to Settle Claim (ECF 156 & 156-1), the Movants would state that the Claimant has failed to identify what their claim is and for and thus should be denied for failure to state a proper claim.

WHEREFORE, the Movants hereby pray that this Court grant the relief sought herein, including but not limited to:

- a. A denial of claim 16 in full;
- b. Limiting any recovery to only those instances allowed pursuant to the Federal Bankruptcy Code and Federal Statute.
- c. Values limited to value pursuant to 11 U.S.C. § 502(b)(4).
- d. Any and all other relief the Court finds prudent, including in light of the above, the preemptive denial of Claim 16.

RESPECTFULLY SUBMITTED ON THIS 20th DAY OF September, 2025.

/s/ *Craig A. Brand, Esq.*

By: _____

Craig Alan Brand, Esq.

FBN: 896111

Tel. (305) 878-1477

6462 S. Jamaica Circle

Englewood, Colorado 80111

On behalf of and for:

PICTORIA STUDIOS USA, INC. (Claim No. 14), and

TAKTIK ENTERPRISES, INC. (Claim No. 4).

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than 33 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 33 day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f). *The moving party shall calculate the appropriate response time. If a response time is prescribed by applicable statute, rule, or order, the moving party shall add to the prescribed response time unless service is accomplished by hand delivery, the three (3) days required for mailing under Bankruptcy Rule 9006(f). If a response time is not prescribed by applicable statute, rule, or order, the response time shall be fourteen (33) days, which includes the three (3) days required for mailing under Bankruptcy Rule 9006(f).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this foregoing Objection to Claim No. 5 was ECF filed with the Clerk of Court on this 20th DAY OF September, 2025.

/s/ Craig A. Brand, Esq.

By: _____

Craig Alan Brand, Esq.

FBN: 896111

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